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June 7, 2002

Electronic Filing
Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW, Room TWB-204
Washington, DC 20554

Re: FCC Seeks Comment On AT&T Request to Contribute to Universal Service
Based on Projected Revenues, CC Docket No. 96-45, DA No. 02-376

Federal-State Joint Board on Universal Service, CC Docket No. 96-45; 1998
Biennial Regulatory Review – Streamlined Contributor Reporting Requirements
Associated with Administration of Telecommunications Relay Service, North
American Numbering Plan, Local Number Portability, and Universal Service
Support Mechanisms, CC Docket 98-171; Telecommunications Services for
Individuals with Hearing Speech Disabilities and the Americans with Disabilities
Act of 1990, CC Docket No. 90-571; Administration of the North American
Numbering Plan and North American Numbering Plan Cost Recovery
Contribution Factor and Fund Size, CC Docket No. 92-237, NSD File No. L-0072; Number Resource Optimization, CC Docket No. 99-200; Telephone Number
Portability, CC Docket No. 95-116; and Truth-in-Billing and Billing Format, CC
Docket No. 98-170

<u>In the Matter of the Schools and Libraries Universal Support Mechanism,</u> CC Docket No. 02-6

Dear Ms. Dortch:

On Tuesday June 4, 2002, James Cicconi, General Counsel of AT&T, and I met with Commissioner Kevin Martin and Dan Gonzalez, Legal Adviser to Commissioner Martin. In that meeting, we discussed issues related to aforementioned dockets. We stressed the need for the Commission to permanently fix the universal service contribution mechanism by adopting a per

connection assessment methodology consistent with AT&T's and other carrier's comments as soon as possible for implementation on January 1, 2003. We also stressed the fact that the current assessment mechanism (which assesses AT&T, and consequently AT&T's customers, based on six-month old revenue data) results in AT&T's customers bearing a disproportionately higher share of the universal service contribution in the long distance marketplace. That fact is reflected in the current AT&T collection rate of 11.5% versus other carriers in the marketplace whose collection rates are significantly lower due solely to the fact that their interstate revenues are increasing. We reiterated that the current assessment mechanism, which bases assessment on (six-month old) interstate revenues, is irretrievably broken.

In addition, we urged the Commission to utilize some of the approximately \$950 million in "unused funds" identified from the Schools and Libraries programs for years one and two of the program to offset increases in the USF Assessment factor for the third and fourth quarters 2002.

One copy of this Notice is being submitted for each of the referenced proceedings in accordance with the Commission's rules.

Very truly yours,

Robert W. Zummy.

cc: Commissioner Kevin Martin

Dan Gonzales